US ERA ARCHIVE DOCUMENT

April 9, 2014

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Chief, Environmental Enforcement Section Environment and Natural Resources Division U.S. Department of Justice P.O. Box 7611, Ben Franklin Station Washington, D.C. 20044-7611

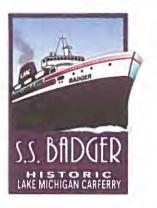
Director, Water Enforcement Division
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Mail Code 2243A
1200 Pennsylvania Ave., NW
Washington, DC 20460

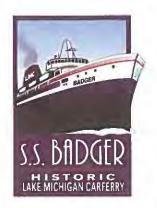
Director, Water Division
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Blvd. (W-15J)
Chicago, IL 60604

Re: United States v. Lake Michigan Trans-Lake Shortcut, Inc., d/b/a Lake Michigan Carferry Service and S.S. Badger, No. 1:13-cv-317, DOJ Case No. 90-5-1-1-10771 (W.D. Mich.)

## Dear Sir or Madam:

Pursuant to the notification requirement in Paragraph 30 of the Consent Decree in *United States* v. Lake Michigan Trans-Lake Shortcut, Inc., d/b/a Lake Michigan Carferry Service and S.S. Badger, Civil Action No. 13-00317 (W.D. Mich. entered into Oct. 10, 2013), attached please find a copy of the application submitted on behalf of Lake Michigan Carferry ("LMC") to the American Bureau of Shipping seeking review of compressed air system designs as part of LMC's installation of combustion control technology on the Badger. Combustion control technology is being designed and installed on the Badger in order to meet the interim effluent limits set forth in Appendix A to the Consent Decree. LMC anticipates engineering and installation of the new combustion control technology to be completed before the start of the 2014 Operating Season.





Additionally, pursuant to Paragraph 43B of the Amendment to the Consent Decree, attached please find the lab analysis of coal purchased to be used on the S.S. Badger during the 2014 Operating Season. The lab analysis reports the ash, mercury, and sulfur content of the coal purchased. If additional coal is purchased for use during the 2014 Operating Season, LMC will provide additional analyses. With this submission, LMC has fulfilled the requirements set forth in Paragraph 43B of the Amendment to the Consent Decree.

Please do not hesitate to contact me if you have questions or require additional information.

Very truly yours,

Charles R. Leonard

Vice-President, Navigation

Lake Michigan Carferry Service

Attachments

From: Marine Shop [mailto:

Sent: Friday, April 04, 2014 2:03 PM

To: EShtaygrud@eagle.org Cc: cleonard@pmship.com Subject: Badger 5300348

Good afternoon Mr. Shtaygrud,

In an effort to address several issues with the compressed air system aboard our vessel S.S. Badger (ABS no. 5300348) we have been directed to you by Mr. Mohammad Ahmed.

This vessel has an existing original compressed air system utilizing a single 7.5 Hp electrically driven compressor to deliver air at 175psig and 25 CFM. Additionally there are two steam reciprocating air compressors used as needed to deliver additional volume. Over the course of time the original black iron piping has degraded and the system has been modified by the crew to the extent that a renovation was thought to be the best course. This coupled with an increased demand for compressed air over time and a pending need for even more volume in the next operating season prompted us to undertake an up-grade at this time.

We have researched our needs and what we propose to do is replace the 7.5 Hp 25CFM electrically driven compressor with a 15HP 35 CFM machine, relocate the compressor from the automobile deck into the engine room for a better environment and replace the piping with stainless steel. We will retain the steam driven compressors to provide the large volume low-pressure air needed periodically in our boiler room.

We propose to use a Quincy brand air compressor and Victaulic's Vic-Press piping system utilizing 316 stainless steel fittings and piping, valves will be manufactured in stainless steel by Jomar.

We have had a naval architect, generate a set of drawings for us and would like to get them to your attention so that we may proceed with this project. We would like to complete installation by mid-May.

Your comments and guidance will be appreciated, and I can be contacted at any time at the numbers below.

Regards,

**Charles Cart** 





October 21, 2013

Page 1 of 1

Client Sample ID: Date Sampled: East Pile-North Section Oct 8, 2013

Sample Taken At: Sample Taken By:

Sample ID By:

Date Received: Oct 9, 2013 Product Description: COAL

Sample ID: 
US 1 0 US 1

SGS Minerals Sample ID: 491-1374432-002

Moisture, Total %	Method ASTM D3302	As Received 4.66	Dry	DAF
Ash %	ASTM D3174/D7582	5.57,	5.84	
Sulfur %	ASTM D4239 (A)	0.67	0.70	
Gross Calorific Value Btu/lb	ASTM D5865	13543	14204	15085
Chlorine, CL %	ASTM D4208	0.23	0.25	
Fluorine, F µg/g	ASTM D3761		23.9	
	ASTM D6722	0.03	0.03	

TRACE ELEMENTS - DRY BASIS Lead, Pb Result Unit

Method

5 μg/g

**ASTM D3683** 

James P. Nelson Great Lakes Operations Manager

SGS North America Inc.

Minerals Services Division

16130 Van Drunen Road South Holland IL 60473 t (708) 331-2900 f (708) 333-3060 www.sgs.com/minerals

Member of the SGS Group (Société Générale de Surveillance)

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## **Analysis Report**

October 21, 2013

Page 1 of 1

Client Sample ID:

East Pile-South Section

Date Sampled: Date Received: Oct 8, 2013

Oct 9, 2013

**Product Description:** COAL

Sample ID By:

Sample Taken At: Sample Taken By:

Sample ID:

US/8U9AAD

P. O. #:

AU04350

SGS Minerals Sample ID: 491-1374432-001

	Method	As Received	Dry	DAF
Moisture, Total %	ASTM D3302	4.53	10.000 and 1	
xAsh %	ASTM D3174/D7582	5.81	6.09	
Sulfur %	ASTM D4239 (A)	0.68	0.72	
Gross Calorific Value Btu/lb	ASTM D5865	13765	14418	15353
Chlorine, CL %	ASTM D4208	0.23	0.25	
Fluorine, F µg/g	ASTM D3761		26.9	
Mercury, Hg µg/g	ASTM D6722	0.04	0.05	

Tests TRACE ELEMENTS - DRY BASIS Lead, Pb

Result Unit

Method

5 µg/g

**ASTM D3683** 

no P Aleson

James P. Nelson **Great Lakes Operations Manager** 

SGS North America Inc.

Minerals Services Division

16130 Van Drunen Road South Holland IL 60473 t (708) 331-2990 f (788) 333-3060 www.sga.com/minerals

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## **Analysis Report**

October 21, 2013

Page 1 of 1

Client Sample ID:

West Pile-South Section

Sample ID By:

Date Sampled:

Oct 8, 2013

Sample Taken At:

Date Received:

Oct 9, 2013 Sample Taken By:

Sample ID

DAL ONAWAT

Product Description: COAL

P O.#:

AU04350

SGS Minerals Sample ID: 491-1374432-003

	Method	As Received	Dry	DAF
Moisture, Total %	ASTM D3302	3.94	-	-
*Ash %	ASTM D3174/D7582	5.75	5.99	
Sulfur %	ASTM D4239 (A)	0.70	0.73	
Gross Calorific Value Btu/lb	ASTM D5865	13760	14325	15238
Chlonne, CL %	ASTM D4208	0.24	0.25	
Fluorine, F µg/g	ASTM D3761		32.0	
+Mercury, Hg μg/g	ASTM D6722	0.05	0.05	

TRACE ELEMENTS - DRY BASIS Lead, Pb

Result Unit

Method

5 µg/g

**ASTM D3683** 

James P. Nelson Great Lakes Operations Manager

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